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## Alaska Telephone Association

Dave Goggins  
President

201 E. 56<sup>th</sup> Avenue, Suite 114  
Anchorage, AK 99518  
(907) 563-4000  
www.alaskatel.org

Christine O'Connor  
Executive Director

November 20, 2017

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

RE: Ex parte filing in WC Docket Nos. 16-271

Dear Ms. Dortch:

On November 16<sup>th</sup> the undersigned, joined by Chris Nierman, Senior Counsel for GCI and Julie Veach, counsel for GCI, and joined telephonically by Laura Kompkoff and Chris Spencer with Copper Valley Telephone Cooperative and Jeff Fulton with Bristol Bay Telephone Cooperative, met with Jesse Jachman, Ying Ke, Jonathan Lechter, and Alec MacDonell in the Wireline Competition Bureau, and Matthew Warner and Matthew Collins in the Wireless Telecommunications Bureau, and Sherika Wynter and Bill Johnson with the Universal Service Administrative Company telephonically, to discuss reporting requirements related to the Alaska Plan.

During the meeting Ms. O'Connor, Mr. Nierman, and Ms. Veach discussed the instructions for reporting middle mile facilities which apply to companies participating in the Alaska Plan.<sup>1</sup> We stated that the purpose of the reporting is to define middle mile connections between communities in order to evaluate whether changes in commitments for Alaska Plan participants are appropriate according to the Alaska Plan Order. The Alaska Plan recognized the pivotal role of these connections into communities by authorizing initial commitments according to the availability and technology of middle mile connections into communities. The Order did not examine last mile capabilities because they are not the key factor in evaluating the ability of a participant in providing broadband service at defined speeds, latency, usage and rates. The key factor in evaluating commitments is middle mile infrastructure between communities, not last mile facilities within the community. Additional reporting beyond the scope of the Alaska Plan Order will divert significant resources from broadband service and deployment.

Respectfully submitted,

*Via ECFS 11/20/2017*

Christine O'Connor  
Executive Director

cc: Jesse Jachman  
Ying Ke

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<sup>1</sup> See Public Notice "WIRELINE COMPETITION BUREAU AND WIRELESS TELECOMMUNICATIONS BUREAU RELEASE INSTRUCTIONS FOR FILING TERRESTRIAL MIDDLE-MILE NETWORK MAPS," DA 17-865, released September 8, 2017.

Jonathan Lechter  
Alec MacDonell  
Matthew Warner  
Matthew Collins  
Bill Johnson  
Sherika Wynter